

Message

From: Young, Dianna [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1F40B43CB3DA4607B17140C42CA12A12-YOUNG, DIANNA]
Sent: 4/23/2014 9:45:57 PM
To: Cheatham, Reggie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c04c7b4fbf4d45108592282991c719cb-RCheatha]; Bertrand, Charlotte [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f044d768e05842e1b75321ff6010e1b8-Bertrand, Charlotte]; Cooke, Maryt [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d124f0fd0fd94a00ac79c9cc5701bcd4-Mcooke02]
Subject: FW: Arc Ecology may petition EPA to list Treasure Island

As I mentioned in staff mtg.

From: Chesnutt, John
Sent: Friday, April 18, 2014 8:37 PM
To: Young, Dianna
Cc: Commisso, Angela
Subject: FW: Arc Ecology may petition EPA to list Treasure Island

fyi

From: Chesnutt, John
Sent: Friday, April 18, 2014 5:36 PM
To: Herrera, Angeles; Tenley, Clancy; Henning, Loren; Stensby, David; Moutoux, Nicole
Subject: Arc Ecology may petition EPA to list Treasure Island

I met with Saul Bloom today and he's really concerned about rad exposures to residents at Treasure Island, a non-NPL BRAC site. Since it was put on the BRAC list, DoD gave us some FTE to help the process along, but we've played a limited role and DTSC is the lead. As issues surrounding rad contamination and lack of characterization is getting more attention, and press, some residents are getting extremely concerned about radiation around them. Some rad devices have been discovered right outside people's doors. Saul does not feel like the State or the Navy are appropriately addressing the potential risk there, and tells me he plans on petitioning EPA in the coming weeks to evaluate and list the site. At the same time, he's pulling together a detailed analysis to support his assertion that EPA needs to step in. He realizes this is a complicated process and given the active State role, EPA may not deem it's necessary, and the Governor may not agree, but sounds like he's going to press us anyway.

Just a heads up for now,

John

Message

From: Henning, Loren [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3AAE3E0D0D764AA5AF728C00CB7ADA14-LHENNING]
Sent: 5/14/2014 6:23:13 PM
To: Chesnutt, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e1cd369e94474c2c8a876fb16943320a-JCHESNUT]; Stensby, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7f3ea928a8db486b95b1f758507a38de-DSTENSBY]
CC: Herrera, Angeles [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8aa7ea9bf6c74f0783906f40a4252630-AHERRERA]
Subject: RE: Request for a meeting

Thanks for forwarding this John. If you have any more contact with Mr. Bloom you can put him in touch with me. I'll work with Clancy et al on this.

Loren

From: Chesnutt, John
Sent: Wednesday, May 14, 2014 10:45 AM
To: Henning, Loren; Stensby, David
Cc: Herrera, Angeles
Subject: Fw: Request for a meeting

Fyi. We suspected this soon. One or both of you should participate in this meeting whenever it happens.

John

From: Saul Bloom <saulbloom@arceceology.org>
Sent: Wednesday, May 14, 2014 10:36:30 AM
To: Tenley, Clancy
Cc: Chesnutt, John
Subject: Request for a meeting

Hi Clancy,

It's been a while since we've spoken. As you may or may not know, Arc Ecology's interests aren't limited to the Bayview and Hunters Point Shipyard. We also provide technical support to communities around the Bay Area and the State. Treasure Island is of particular importance to us. I was a member of the Treasure Island Reuse Advisory Committee (the predecessor to the Treasure Island Advisory Committee), we were instrumental in the creation of the Treasure Island Restoration Advisory Board and have been members of the since its inception.

I met with John Chestnut on April 18th to talk about evaluating Treasure Island for NPL listing. John suggested that when he returned from his vacation the two of us sit down with you to talk about this further. I wanted to give John a couple of weeks to get settled back in before forwarding this request to you.

Years ago when TI first closed it was one of the last installation's in the region I would have considered for NPL listing. Unfortunately as we have all learned over the last couple of years – much to our collective disappointment I think – TI is not the installation we thought it was when it was closed.

At the time, it was generally assumed that TI had been largely administrative, with some training activities and housing. Indeed even the Navy's Regional Plans from 1986 onward failed to mention the extent to which TI had actually been a significant training and industrial site.

As a consequence of this lack of information, the City put a lot of energy into making TI a residential community with a significant amount of recreational and cultural activities. There are now more than 2,000 full time residents not including the youth housed there by the Job Corps program. Unfortunately these post closure uses has brought the general public and most significantly residents directly into long term contact with contamination and remedial sites.

While TI may still be less contaminated than other sites; it is this proximity of residents and the public to sites more significantly contaminated than previously believed and the recent revelations of the likelihood of a more generalized distribution of undocumented radiological and toxic contamination that warrants another look at inclusion on the NPL.

Many residents of the Island have been there over ten years and are thus within the time frame for ailments derived from environmental exposure. News reports by the San Francisco Chronicle and the Center for Investigative Reporting are reporting ailments typical of environmental exposure in the residents.

I realize (and John certainly pointed out) that there hasn't been any new NPL listings in quite some time. Nevertheless having recently reviewed EPA's guidance for listing, it does seem to me that TI might fit the bill. There would be a number of benefits to public and environmental health from listing including enhancing facility's priority for BRAC cleanup dollars.

I would appreciate the opportunity to meet with you and John at your earliest convenience to explore this question further. If you are interested, I can arrange for a tour similar to the one I provided for the Bayview in 2011.

Thanks,

Saul Bloom
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Message

From: Manzanilla, Enrique [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0482B3CC383348B887A1800BC40C0A72-EMANZANI]
Sent: 6/2/2014 4:31:46 PM
To: Henning, Loren [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3aae3e0d0d764aa5af728c00cb7ada14-LHENNING]
Subject: Fw: Following up on TI discussion

From: Tenley, Clancy
Sent: Monday, June 2, 2014 8:50:29 AM
To: Manzanilla, Enrique
Cc: Herrera, Angeles; Yogi, David; Harris-Bishop, Rusty; Moutoux, Nicole
Subject: FW: Following up on TI discussion

Fyi below, a long but informative summary from Saul Bloom of his concerns re TI and his interest in listing. Angeles and I will follow up with Saul.
David and Rusty – copying you as a heads up for potential community involvement and press issues.

Clancy Tenley
Assistant Director
Superfund Division
(415)972-3785

From: Saul Bloom [mailto:saalbloom@arcecoecology.org]
Sent: Friday, May 30, 2014 4:01 PM
To: Moutoux, Nicole; Tenley, Clancy; Chesnutt, John
Cc: Henning, Loren; Herrera, Angeles
Subject: RE: Following up on TI discussion

Hello Nicole,

Thanks for the call today. I wanted to follow up with this email because I fear I wasn't as articulate about our rationale for the meeting and our interest in the review.

As I mentioned on the phone, Arc Ecology interest is not being driven by press reports. It is being driven instead by our review of the Navy's investigation of the site, the concerns raised by CADPH and residents of the Island.

A quick bit of background and history. Arc Ecology is a technical services provider and advocacy organization. We provide professional technical expertise with regard to environmental remediation/ health, economic development, and urban planning to environmental and economic justice communities. We have over thirty years in this field and we have won numerous awards and citations for the quality of our work.

We are a science based organization meaning that our policies and activities are driven by our analysis of data, not by a political agenda. This is not to say we don't have a political orientation, but we believe that our programs, policies, practice, ethics, and constituents are best served when we stick to an unbiased, neutral technical approach to our analysis. Like the EPA, this often means that we please no one, but it is our belief that pandering to people's biases serves no one's interests. Between 1983 and today we have had staff scientists assigned to the Hunters Point Shipyard, the Presidio, Treasure Island, NAS Alameda, Oakland Army Base, and Mare Island and served on the RABs for those sites. We also served as the community tech advisory under the EPA TAG program for Fort Ord and the Hunters Point Shipyard. Most recently we served on the Yosemite Slough Technical Advisory Committee and project manager Craig

Cooper and I collaborated on the signs now posted around the Slough. You may know us Ms. Moutoux from our work with Ms. Carolyn Douglas on the EPA Bayview Hunters Point Brownfield Environmental Site Assessment (May 2011).

One example of how we approach our work is captured in the power point presentation the EPA has posted on its Hunters Point Shipyard web page. <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/fd834b7f80de8b7388257a55007f4900!OpenDocument>.

As you will see if you access it, the Bayview Hunters Point community – our neighborhood – is deeply suspicious of the planned stabilization and capping of the Hunters Point Shipyard Parcel E2 landfill. So were we, and for 20 years our view was that it should be removed. The presentation is the outcome of our questioning the Community's and our own long held view by hiring a panel of independent technical experts and undertaking a neutral review. The EPA funded this review through the India Basin Neighborhood Technical Assistance Grant. In this instance the review found that the Navy's plan was indeed sound and it led many in the Bayview along with ourselves to change our views about it. Craig Cooper the former EPA project manager for the Shipyard found the process very helpful and was an integral part of it (although neither we, the EPA, Navy, City nor Lennar were allowed to influence the findings of the panel). Both EPA community engagement coordinator Jackie Lane and federal facilities supervisor John Chestnut attended at least one of our public meetings for the Independent Review.

Now about TI

Arc Ecology has been engaged in the TI cleanup and reuse issue since the late 1980's. I testified before the House Subcommittee on Military Facilities and Construction in 1991 on the environmental issues associated with TI. We helped create the TI RAB and have been members since its inception. I was a member of the original TI reuse advisory committee. At the time TI was selected for closure, it was an administrative facility and the assumption was that there had only been light industrial activity akin to what had been going on at the Presidio. As such to my knowledge TI was never on the radar for the NPL and has functioned since the cleanup program began as a State led site operating under an FFSRA. Thus the EPA has been mostly a tangential participant in the TI remedial program.

When the Navy decommissioned TI in 1997, its large stock of housing, administrative, and commercial buildings were vacant. Advocates began pressing the City to use some of the housing for homeless families and individuals, and to rent out vacant town homes to low-income families at below market rates. Arc Ecology was deeply involved in the reuse discussions, and we warned that moving a vulnerable population onto a Navy cleanup site we still knew little about could be risky. But homeless advocates argued that over the short time they expected people to live on the Island, toxic exposure would be less hazardous than life on the street. This, plus the City's desire to fill the buildings so they wouldn't be damaged or occupied by vandals and squatters, led the City to pressure both the Navy and State of California to allow leasing both of the homes and of other facilities for businesses.

Fair enough but Arc Ecology wasn't the only entity expressing concern. At first the State balked, both DTSC regional federal facility coordinator and their own site manager expressed deep concerns about the efficacy of this idea. But the powerful politicians leading the City were able to sway DTSC to allow the use. Based on what we understood the conditions to be at the time Arc Ecology reluctantly supported the proposal, stating that it was possible to have residences adjacent to cleanup sites and that the risk to residents was a function of the severity of the contamination and the quality of the management of the cleanup program. Arc Ecology urged the City to at least warn renters not to dig in their backyards or plant vegetable gardens or fruit trees, and to keep children away from excavation sites. The City promised it would put notices in the leases – but based on several discussions with long term tenants - it appears the City never did. Other conversations revealed the City was concerned it would scare off renters!

We told the City we would be keeping a close eye on public and environmental health risks. In 2012 we began advising a community activist who had initiated a California Public Records Act investigation of the correspondence between the CA DPH and CA DTSC resulting from CA DPH's response to the discovery that radioactive contamination was more disperse than was previously known. As you know the contractor Shaw was ordered to halt its work while the Navy, CDPH, and CA DTSC undertook a review. That same year we brought on former EPA project manager Martha Walters to lead our TI and Hunters Point Shipyard project work and in 2013 we hired one of the analysts from the Shipyard review

to look over the Navy's RAD response plan. We also were contacted by TI residents who wanted us more deeply involved in the process.

Rationale for the NPL evaluation; Why seek EPA involvement?

The TI of today is meaningfully different than the one we all thought existed in the early 1990's. While on its own the current degree of contamination may not be sufficient to warrant listing; One of the principle rationales for evaluating a site in the EPA's NPL ranking tool kit is proximity of humans to the pollution. In the case of TI there is virtually no separation between residents and the contamination. The reason why we are interested in evaluating TI for the NPL is that what had been originally thought of as short term housing has turned into a home to people going on 15 years. Today, around 2000 people call TI home. Nearly 30 percent live in poverty, and Island wide, the median income is less than half of San Francisco's as a whole. 25% are African American and 23% are Hispanic. That makes Treasure Island San Francisco's second largest environmental justice community, after Bayview Hunters Point. As you know from an exposure point of view, illnesses begin to pop up after 10 years and we are beginning to see some serious health problems on the Island. Some teenagers residing on the Island have spent their entire lives there. While we recognize that causality on an individual basis is very hard to prove, it is generally accepted that uncontrolled comingling of pollutants and people over a long period is not a good idea.

Because so much of the press is focused on the radiation issue. It is entirely possible that if the current round of data collection on the subject demonstrates that RAD contamination is not a serious public health threat, the focus on risks to the tenants could go away. Unfortunately, though media-genic, RAD is only a component of the overall contamination issue. Chemical pollution on the other hand was the reason for the most recent spate of resident relocations. Proving RAD is not a threat (and this statement should not be taken to mean we have reached any conclusions on this subject because it is our view there isn't enough data currently to support any conclusions) does not prove the Island is safe for occupancy.

The simple fact is we have learned more about TI in the past three years than we have in all of the preceding ones since the remedial response began and the story is troubling.

Summary

Right now residents of TI do not know where in government they can go for an unbiased point of view on their health and exposure. We have asked the City to look into the health issue, conduct a health survey of tenants, and maybe undertake an epidemiological survey. The City has refused. Its argument is the population is too small, but as I recall from Love Canal and Aerojet, the impacted neighborhoods were not much bigger and there have been other studies of towns and communities of similar size across the country. The City, its property manager and developers are nervous because they were party to the decision to rent the property. The Navy and State are nervous because they allowed the use. CDPH has raised a number of concerns but as the emails obtained through the CPRA (the State's FOIA program) shows there was a lot of pressure put on that agency. I spoke with Ryan Miya at DTSC now working on TI and he did not object when I brought this idea up. There are many reasons DTSC and CDPH might be interested in this approach. But for residents of TI, the simple fact is the EPA is the only governmental agency able to address the pollution issue that is not seriously tainted by the decision to make the Island's housing and other spaces available for tenancy.

The residents on TI need a neutral evaluation and in our view the best place to start would be the hazard ranking process.

There are many more things to discuss but this email is certainly long enough. I hope it better explains who we are, what our concern is, and why we are asking for the evaluation.

I look forward to meeting with you all in person.

Thanks you,

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From: Moutoux, Nicole [<mailto:Moutoux.Nicole@epa.gov>]
Sent: Thursday, May 29, 2014 8:36 AM
To: Tenley, Clancy; Saul Bloom; Chesnutt, John
Cc: Henning, Loren; Herrera, Angeles
Subject: RE: Following up on TI discussion

Hello Saul-

Please let me know if you are available to speak tomorrow (Friday, May 30) at 11 am PST. If that is a good time, can you please send me a number where you can be reached.

Thank you. Looking forward to speaking with you.

Nicole Moutoux

Nicole G. Moutoux
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From: Tenley, Clancy
Sent: Thursday, May 29, 2014 8:28 AM
To: Saul Bloom; Chesnutt, John
Cc: Henning, Loren; Moutoux, Nicole; Herrera, Angeles
Subject: RE: Following up on TI discussion

Thank you Saul. I just got a chance to speak with our internal team late yesterday. Nicole Moutoux or Loren Henning will give you a call today to set a date and agenda topics. Looking forward to catching up with you.

Clancy Tenley
Assistant Director
Superfund Division
(415)972-3785

From: Saul Bloom [<mailto:saulbloom@arcecology.org>]
Sent: Wednesday, May 28, 2014 5:44 PM
To: Chesnutt, John; Tenley, Clancy
Subject: Following up on TI discussion

Hello Gentlemen,

I hope your travels were productive. I'm just following up to see when it might be convenient to meet to discuss the TI issue.

Thanks,

Saul Bloom
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